

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

FRANCHISE GROUP, INC., *et al.*¹

Debtors.

Chapter 11

Case No. 24-12480 (LSS)

Jointly Administered

Objection Deadline: May 5, 2025

Hearing Date: May 12, 2025 at 10:00 a.m. ET

**NOTICE OF THE SETTLEMENT-RELATED LIQUIDATING TRUST 2022-23'S
MOTION PURSUANT TO RULE 3018(A) OF THE FEDERAL RULES OF
BANKRUPTCY PROCEDURE FOR TEMPORARY ALLOWANCE OF CLAIMS
FOR PURPOSES OF VOTING TO ACCEPT OR REJECT PLAN**

PLEASE TAKE NOTICE that The Settlement-Related Liquidating Trust 2022-23 (the “Prophecy Trust”), filed *The Settlement-Related Liquidating Trust 2022-23’s (I) Motion Pursuant to Rule 3018(a) of the Federal Rules of Bankruptcy Procedure for Temporary Allowance of Claims for Purposes of Voting to Accept or Reject Plan; and (II) Response to First Omnibus (Non-Substantive) Objection of the Ad Hoc Group of Freedom Lenders to Certain Claims Filed Against the Holdco Debtors* (the “Motion”).

PLEASE TAKE FURTHER NOTICE that if you wish to respond to the Motion, you must do so in writing, and file your response with the United States Bankruptcy Court for the District

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of their U.S. federal tax identification numbers, to the extent applicable, are Franchise Group, Inc. (1876), Freedom VCM Holdings, LLC (1225), Freedom VCM Interco Holdings, Inc. (2436), Freedom Receivables II, LLC (4066), Freedom VCM Receivables, Inc. (0028), Freedom VCM Interco, Inc. (3661), Freedom VCM, Inc. (3091), Franchise Group New Holdco, LLC (0444), American Freight FFO, LLC (5743), Franchise Group Acquisition TM, LLC (3068), Franchise Group Intermediate Holdco, LLC (1587), Franchise Group Intermediate L, LLC (9486), Franchise Group Newco Intermediate AF, LLC (8288), American Freight Group, LLC (2066), American Freight Holdings, LLC (8271), American Freight, LLC (5940), American Freight Management Company, LLC (1215), Franchise Group Intermediate S, LLC (5408), Franchise Group Newco S, LLC (1814), American Freight Franchising, LLC (1353), Home & Appliance Outlet, LLC (n/a), American Freight Outlet Stores, LLC (9573), American Freight Franchisor, LLC (2123), Franchise Group Intermediate B, LLC (7836), Buddy’s Newco, LLC (5404), Buddy’s Franchising and Licensing LLC (9968), Franchise Group Intermediate V, LLC (5958), Franchise Group Newco V, LLC (9746), Franchise Group Intermediate BHF, LLC (8260); Franchise Group Newco BHF, LLC (4123); Valor Acquisition, LLC (3490), Vitamin Shoppe Industries LLC (3785), Vitamin Shoppe Global, LLC (1168), Vitamin Shoppe Mariner, LLC (6298), Vitamin Shoppe Procurement Services, LLC (8021), Vitamin Shoppe Franchising, LLC (8271), Vitamin Shoppe Florida, LLC (6590), Betancourt Sports Nutrition, LLC (0470), Franchise Group Intermediate PSP, LLC (5965), Franchise Group Newco PSP, LLC (2323), PSP Midco, LLC (6507), Pet Supplies “Plus”, LLC (5852), PSP Group, LLC (5944), PSP Service Newco, LLC (6414), WNW Franchising, LLC (9398), WNW Stores, LLC (n/a), PSP Stores, LLC (9049), PSP Franchising, LLC (4978), PSP Subco, LLC (6489), PSP Distribution, LLC (5242), Franchise Group Intermediate SL, LLC (2695), Franchise Group Newco SL, LLC (7697), and Educate, Inc. (5722). The Debtors’ headquarters is located at 109 Innovation Court, Suite J, Delaware, Ohio 43015.

of Delaware, 824 North Market Street, 6th Floor, Wilmington, Delaware 19801, so that it is actually received on or before **4:00 p.m. ET on May 5, 2025**.

PLEASE TAKE FURTHER NOTICE that at the same time, you must also serve a copy of the response upon Movant's counsel:

Marla S. Benedek, Esq.
Kaan Ekiner, Esq.
1201 North Market Street, Suite 1001
Wilmington, DE 19801

PLEASE TAKE FURTHER NOTICE THAT IF OBJECTIONS ARE FILED, A HEARING ON THE MOTION WILL TAKE PLACE ON MAY 12, 2025 AT 10:00 A.M. ET BEFORE THE HONORABLE LAURIE S. SILVERSTEIN, UNITED STATES BANKRUPTCY JUDGE, UNITED STATES BANKRUPTCY COURT, 824 N. MARKET STREET, 6TH FLOOR, COURTROOM #2, WILMINGTON, DE 19801.

PLEASE TAKE FURTHER NOTICE THAT IF YOU FAIL TO RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED BY THE MOTION WITHOUT FURTHER NOTICE OR HEARING.

COZEN O'CONNOR

Dated: March 13, 2025

/s/ Marla S. Benedek

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Liquidating Trust 2022-23*